

March 16, 2004

VIA HAND DELIVERY

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: Investigation on Distributed Generation, D.T.E 02-38

Dear Secretary Cottrell:

In compliance with the February 24, 2004 order of the Department of Telecommunications and Energy (the "Department") in the above-referenced docket, enclosed are copies of Western Massachusetts Electric Company's ("WMECO" or the "Company") compliance tariff, M.D.T.E. No. 1039A. This tariff implements the Model Tariff provisions approved by the Department in D.T.E. 02-38.

In accordance with the Hearing Officer's March 11, 2004 ruling in this case, WMECO's tariff reflects an effective date of April 1, 2004. Further, with respect to the application of this tariff to Qualifying Facilities ("QFs"), WMECO proposes that individual QFs be permitted to select at the outset of their application process whether a particular project will be subject to the enclosed tariff or the Department's previously-approved policies and processes applicable to QFs. However, once a QF makes an election in this area, its interconnection process would be governed exclusively by the specific interconnection procedure the QF has chosen.

The Company has also enclosed a redlined version that compares M.D.T.E. No. 1039A to Attachment A of the Department's February 24 order. The following are minor changes made by WMECO to the tariff contained in Attachment A:

- ✍✍ General typographical errors and spacing between words have been corrected throughout the document.
- ✍✍ Two additional pages were added to expand the Applicability section. Language for these two pages was taken from wording in the D.T.E. 02-38-B Order and the Distributed Generation ("DG") Interconnection Tariff (Basic Understandings).
- ✍✍ References pertaining to all distribution companies were changed to refer only to WMECO.
- ✍✍ The Table of Contents was repaginated to reflect the tariff. In addition, certain headings in the Table of Contents were changed to correspond to the text of the tariff. These were:

- ?? Section 1.2 – Agreements changed to 1.3 Forms and Agreements
- ?? Section 5.1 – Study and Review Costs changed to Review and Study Costs
- ?? Section 5.2 – Interconnection Facilities Costs changed to Interconnection Equipment Costs
- ?? Section 5.3 – Separation of Costs changed to Section 5.4
- ?? Section 5.4 – Normal Payment Procedure changed to Section 5.5
- ?? Section 5.5 – Security and Creditworthiness changed to Section 5.6
- ?? Section 8.3 – General Monitoring and Communication Requirements changed to Section 8.2, Additional Monitoring and Communication Requirements
- ?? Section 11.1 – General Liability and Automobile changed to General Liability

~~✍~~~~✍~~To conform to WMECO's current tariff formats, footnotes were removed and added into the text of the document as Notes.

~~✍~~~~✍~~For Exhibits C, D, E, F, G the boxed outlines around the applications were removed to conform to WMECO's current tariff formats.

~~✍~~~~✍~~In the bulleted section on Net Metering, page 50, the phrase, "For Facilities under 60 KW" was changed to "Facilities 60 KW or less."

~~✍~~~~✍~~In Section 1.2 Forms and Agreements, exhibit letters were added and rearranged according to the order of the exhibits at the back of the document.

~~✍~~~~✍~~In Table 1 and Table 2, notes were added at the bottom to reference the location of the Explanatory Notes.

~~✍~~~~✍~~The IEEE P1547 Draft Standard Section statement was added at the beginning of each italicized section in Section 4.2.4 to eliminate numbering confusion.

~~✍~~~~✍~~In Section 4.1.3, Frequency, the numbers were changed to those originally submitted by the Collaborative which reflect the mathematically correct deviations from the 60 Hz, e.g., $\pm 2/100$ ($\pm .033\%$).

Please contact me should you have any questions in regard to this filing.

Sincerely,

Donald M. Bishop
Manager, Regulatory Policy – Massachusetts

Enclosures